

Priority	PSAP_NAME	COUNTY	ST	TELCO_NAME	Notes
1	King County Sheriffs Office	KING	WA	Qwest	MSAG 100%
1	Kirkland Police Department	KING	WA	Qwest	MSAG 100%
1	Kitsap County-CENCOM	KITSAP	WA	Qwest	MSAG 100%
1	Lewis County 9-1-1 Communications Division	LEWIS	WA	Qwest	MSAG 100%
1	Marysville Police Department	SNOHOMISH	WA	Verizon	MSAG 100%
1	McChord Air Force Base Fire Department	PIERCE	WA	Qwest	MSAG 100%
1	Pacific County Communications	PACIFIC	WA	Qwest	MSAG 100%
1	Pencom-Clallam County	CLALLAM	WA	Qwest	MSAG 100%
1	Puyallup Communications	PIERCE	WA	Qwest	MSAG 100%
1	Redmond Police Department	KING	WA	Qwest	MSAG 100%
1	San Juan County Sheriffs Office	SAN JUAN	WA	Qwest	MSAG 100%
1	Seattle Police Department	KING	WA	Qwest	MSAG 100%
1	Skagit County 9-1-1 Emergency Communications Center	SKAGIT	WA	Verizon	MSAG 100%
1	SNOCOM	SNOHOMISH	WA	Verizon	MSAG 100%
1	SNOPAC	SNOHOMISH	WA	Verizon	MSAG 100%
1	Sumner Communications	PIERCE	WA	Qwest	MSAG 100%
1	Thurston County-CAPCOM	THURSTON	WA	Qwest	MSAG 100%
1	University of Washington Police Department	KING	WA	Qwest	MSAG 100%
1	Valley Communications Center-King County	KING	WA	Qwest	MSAG 100%
2	Buckley Police Department	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Fife Police Department	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Ft Lewis Military Reservation-MADCOM	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Law Enforcement Support Agency	PIERCE	WA	Qwest	MSAG 100%, pending ESQK builds
2	Port of Seattle Police Department	KING	WA	Qwest	MSAG 100%, pending ESQK builds
2	Shelton Police Department (Shelcom)	MASON	WA	Qwest	MSAG 100%, pending ESQK builds
2	What-Comm Communications Center	WHATCOM	WA	Qwest	MSAG 100%, pending ESQK builds
2	Beaver Dam Police Department	DODGE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Dodge County Sheriffs Department	DODGE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Green Lake Sheriffs Office	GREEN LAKE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Ft Atkinson Police	JEFFERSON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Watertown Police Department	JEFFERSON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Kenosha County	KENOSHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Bayside Village Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Brown Deer Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Cudahy Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Franklin Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Greendale Police and Fire	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs

Priority	PSAP_NAME	COUNTY	ST	TELCO_NAME	Notes
2	Greenfield Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Hales Corners Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Milwaukee County Sheriff	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Milwaukee Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Oak Creek Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	South Milwaukee Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	St Francis Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Wauwatosa Police Department	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	West Allis Police and Fire	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	West Milwaukee Police	MILWAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Cedarburg Police	OZAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Grafton Police Department	OZAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Mequon Police	OZAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Ozaukee County Sheriff	OZAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Port Washington Police	OZAUKEE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Burlington Police	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Caledonia Police	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Mt Pleasant Police Department	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Racine County Sheriff	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Racine Emergency Services	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Sturtevant Police	RACINE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Rock County 9-1-1 Communications Center	ROCK	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Sheboygan County Sheriffs Department	SHEBOYGAN	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Sheboygan Police	SHEBOYGAN	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Delavan Police Department	WALWORTH	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Walworth County Sheriffs Department	WALWORTH	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Whitewater Police Department	WALWORTH	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Germantown Police	WASHINGTON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Hartford Police Department	WASHINGTON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Washington County Sheriffs Department	WASHINGTON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	West Bend Police Department	WASHINGTON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Elm Grove Police	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Menomonee Falls Police Department	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Muskego Police Department	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	New Berlin Police Department	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Oconomowoc City Police Department	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Waukesha County Communications	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs

Priority	PSAP_NAME	COUNTY	ST	TELCO_NAME	Notes
2	Waukesha Police Department	WAUKESHA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Brodhead Police Department	GREEN	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Columbus Police Department	COLUMBIA	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Dane County Public Safety Communications	DANE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Dodge County Sheriffs Department	DODGE	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Jefferson County Sheriffs Department	JEFFERSON	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
2	Sauk County	SAUK	WI	SBC	Pending PSAP Sign-off: ESN, MSAG and ESQKs
3	Boone County Emergency Operations Center	BOONE	WV	Verizon	Pending S/R connectivity
3	Cabell County CCERC	CABELL	WV	Verizon	Pending S/R connectivity
3	Fayette County E9-1-1	FAYETTE	WV	Verizon	Pending S/R connectivity
3	Greenbrier County 9-1-1	GREENBRIER	WV	Verizon	Pending S/R connectivity
3	Jackson County Communications	JACKSON	WV	Verizon	Pending S/R connectivity
3	Metro Emergency Operations Center	KANAWHA	WV	Verizon	Pending S/R connectivity
3	Lincoln County 9-1-1	LINCOLN	WV	Verizon	Pending S/R connectivity
3	Logan County Emergency Operations Center	LOGAN	WV	Verizon	Pending S/R connectivity
3	McDowell County 9-1-1 Center	MCDOWELL	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Mingo County 9-1-1	MINGO	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Putnam County E9-1-1	PUTNAM	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Raleigh County Emergency Services	RALEIGH	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Roane County 9-1-1	ROANE	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Summers County 9-1-1	SUMMERS	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Wayne County E9-1-1 Center	WAYNE	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	WERC 9-1-1	WYOMING	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Barbour County Communications Center	BARBOUR	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Braxton Control	BRAXTON	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Brooke County Sheriffs Department	BROOKE	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Hancock County Sheriffs Office	HANCOCK	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Weirton Police Department	HANCOCK	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Harrison County Bureau of Emergency Services	HARRISON	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Lewis County E9-1-1	LEWIS	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Marion County Central Communications	MARION	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Marshall County 9-1-1	MARSHALL	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	MECCA 9-1-1	MONONGALIA	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Wheeling Ohio County 9-1-1	OHIO	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Preston County Communications Center	PRESTON	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Upshur County Communications	UPSHUR	WV	Verizon	MSAG 100%--Pending S/R connectivity
3	Wood County Central Telecommunications Center	WOOD	WV	Verizon	MSAG 100%--Pending S/R connectivity

Priority	PSAP_NAME	COUNTY	ST	TELCO_NAME	Notes
4	Campbell County Sheriffs Department	CAMPBELL	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Casper Police Department		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Casper Public Safety Communications Center		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Cheyenne City Police		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Douglas Police Department	CONVERSE	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Fremont County Sheriffs Office	FREMONT	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Jackson Police Department		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Kemmerer 9-1-1-Lincoln County Sheriff	LINCOLN	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Lander Police Department		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Laramie County 9-1-1 Emergency Center	LARAMIE	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Laramie-Albany County Records and Communications		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Park County Sheriffs Office	PARK	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Pine Bluffs Police Department		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Rawlins Police Department	CARBON	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Riverton Police Department		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Sheridan Law Enforcement Center	SHERIDAN	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Sweetwater County Sheriffs Office		WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Sweetwater County Sheriffs Office		WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Teton County Sheriffs Communications Center	TETON	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Washakie County Sheriffs Department	WASHAKIE	WY	Qwest	MSAG 100%-Pending S/R connectivity
4	Carbon County Sheriffs Office	CARBON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Crook County Sheriffs Office	CROOK	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Hanna Marshals Office	CARBON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Johnson County Law Enforcement Center	JOHNSON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Newcastle Police Department	WESTON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	North Lincoln County Communications	LINCOLN	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Park County Sheriffs Office	PARK	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Platte County Communications	PLATTE	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Saratoga Police Department	CARBON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Yellowstone National Park Police Department	TETON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity
4	Yellowstone National Park Police Department	TETON	WY		Pending ESQs, ESN and MSAGs and S/R connectivity

ATTACHMENT "B"

JOIPHONE'S COMPLIANCE LETTER

SAPRONOV & ASSOCIATES, P.C.

ATTORNEYS AT LAW

SUITE 1455

THREE RAVINIA DRIVE

ATLANTA, GEORGIA 30346-2117

(770) 399-9100

FACSIMILE (770) 395-0505

EMAIL: info@wstelecomlaw.com

November 14, 2006

VIA OVERNIGHT MAIL

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Compliance Letter of Hawk Communications, LLC d/b/a JoiPhone
WC Docket No. 05-196**

Dear Ms. Dortch:

Hawk Communications, LLC, a Georgia limited liability company d/b/a JoiPhone ("JoiPhone"), by its attorneys, hereby respectfully submits the following 911 Compliance Letter ("Compliance Letter"), which contains all of the emergency 911 calling information required by Part 9 of the Federal Communications Commission's ("Commission" or "FCC") Rules ("E911 Rules") and by the Commission's November 7, 2005 Public Notice¹ related thereto.

I. Overview of JoiPhone's Service and 911 Solution.

JoiPhone is a new entrant, a "start-up" company, that seeks to become a provider of Interconnected VoIP services ("Services"). JoiPhone's subscribers will have access to and will use the Services through broadband access connections supplied by third party telephone carriers or other providers. JoiPhone does not provide these connections. Subscribers may sign up for the Services through JoiPhone's Website at <https://signup.joiphone.com/cgi-bin/signup.pl>. Upon signing up for a Service Plan, subscribers will receive an access device (a Linksys "ATA"), together with the E911 warning stickers and information described below.

¹ See, Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005) ("Public Notice").

Ms. Marlene H. Dortch

November 14, 2006

Page 2

JoiPhone has entered into an agreement with Intrado Inc. ("Intrado"),² pursuant to which Intrado, on JoiPhone's behalf, (i) shall provide 911 and E911 services ("911 Service") to all of JoiPhone's subscribers and (ii) has prepared a compliance package on JoiPhone's behalf ("Compliance Package") attached hereto at Exhibit "A" and thereby incorporated herein. The Compliance Package describes how the 911 Service complies with the E911 Rules and Public Notice.

Pursuant to the Intrado Agreement, Intrado shall give JoiPhone periodic notice of new geographic markets where Intrado shall make (previously unavailable) 911 Service available to subscribers. JoiPhone will under no circumstances provide Services to subscribers in markets where 911 Service is unavailable until such time as Intrado gives JoiPhone notice that said 911 Service has become available.

II. Compliance with E911 Rules.

The following is JoiPhone's statement of compliance with the requirements set forth in the E911 Rules. Section references are to Part 9 of the Commission's Rules (47 C.F.R. §§ 9.1, 9.3, 9.5). The following subsections are found in Section 9.5.

- (A) **Scope of Section.** The following requirements are only applicable to providers of interconnected VoIP services. Further, the following requirements apply only to 911 calls placed by users whose Registered Location³ is in a geographic area served by a Wireline E911 Network (which, as defined in Sec. 9.3, includes a selective router).

Response: JoiPhone is a provider of interconnected VoIP services. The following requirements apply to its subscribers in geographic areas served by Intrado's Wireline E911 Network.

² Agreement for Services between Hawk Communications, LLC and Intrado Inc. dated February 14, 2006, as subsequently amended ("Intrado Agreement"). Upon request, JoiPhone shall provide the Commission with a copy of the Intrado Agreement under confidential treatment set forth in the Commission's rules.

³ 47 C.F.R. § 9.3 (defining "Registered Location" as "[t]he most recent information obtained by an interconnected VoIP service provider that identifies the physical location of an end user.").

Ms. Marlene H. Dortch
November 14, 2006
Page 3

(B) E911 Service. As of November 28, 2005:

- (1) Interconnected VoIP service providers must, as a condition of providing service to a consumer, provide that consumer with E911 service as described in this section (Section 9.5).

Response: JoiPhone shall comply with this requirement via the Intrado Agreement and the 911 Service provided to subscribers by Intrado pursuant thereto.

- (2) Interconnected VoIP service providers must transmit all 911 calls, as well as automatic number identification ("ANI") and the caller's Registered Location for each call, to the public safety answering point ("PSAP"), designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to Sec. 64.3001 of this chapter, provided that "all 911 calls" is defined as "any voice communication initiated by an interconnected VoIP user dialing 911."

Response: JoiPhone forwards all 911 calls to Intrado and provides the ANI information to Intrado when the 911 call is forwarded. JoiPhone also obtains (and gives to Intrado) the Registered Location for each subscriber's ANI prior to setting up a new Service account and requires that the subscriber update that location information as a condition of continued provision of 911 Service.

- (3) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI,⁴ via the dedicated Wireline E911 Network.

Response: This is done through Intrado pursuant to the Intrado Agreement.

⁴ 47 C.F.R. § 9.3 (defining "Pseudo Automatic Number Identification (Pseudo-ANI)" as "[a] number, consisting of the same number of digits as ANI, that is not a North American Numbering Plan telephone directory number and may be used in place of an ANI to convey special meaning. The special meaning assigned to the pseudo-ANI is determined by agreements, as necessary, between the system originating the call, intermediate systems handling and routing the call, and the destination system.")

Ms. Marlene H. Dortch
November 14, 2006
Page 4

- (4) The Registered Location must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information ("ALI") database.

Response: Each location is verified and registered through Intrado. Intrado, through use of this location information, routes the 911 call to the proper PSAP.

- (C) **Service Level Obligation.** Notwithstanding the provisions in paragraph (B) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, an interconnected VoIP service provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (B) of this section of an interconnected VoIP service provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to Sec. 64.3001 of the Commission's rules.

Response: Intrado will route the calls to the proper PSAP with Registered Location and ANI. If either the PSAP or the designated answering point cannot accept such information, Intrado will verbally give the information to the designated answering point via the Intrado Emergency Call Support Center. Intrado makes the call center available twenty-four hours per day, every day of the week, every week of the year.

- (D) **Registered Location Requirement.** As of November 28, 2005,⁵ interconnected VoIP service providers must:

- (1) Obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized.

Response: JoiPhone requires all subscribers to provide the physical location at which the service will be used. Intrado, pursuant to the Intrado

⁵ Inasmuch as JoiPhone, a new entrant, was not providing interconnected VoIP service as of that date, JoiPhone assumes that these requirements attach – and JoiPhone shall comply therewith – as of the first day that JoiPhone makes Services available to its subscribers.

Ms. Marlene H. Dortch

November 14, 2006

Page 5

Agreement, verifies that such physical location (i.e., address) has 911 Service available. If Intrado, again pursuant to the Intrado Agreement, advises JoiPhone that the location does not have 911 Service, JoiPhone will not start service at that location.

- (2) Provide their end users one or more methods of updating their Registered Location, including at least one option that requires use only of the CPE necessary to access the interconnected VoIP service. Any method utilized must allow an end user to update the Registered Location at will and in a timely manner.

Response: Subscribers may update their Registered Location via the JoiPhone Website: <http://www.joiphone.com>.

- (3) Specifically advise every subscriber, both new and existing, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service or may be in some way limited by comparison to traditional E911 service. Such circumstances include, but are not limited to, relocation of the end user's IP-compatible CPE, use by the end user of a non-native telephone number, broadband connection failure, loss of electrical power, and delays that may occur in making a Registered Location available in or through the ALI database.

Response: JoiPhone includes this E911 warning on its Website, on the label sent with the ATA to new subscribers, and during the subscriber's sign up for Service.

- (4) Obtain and keep a record of affirmative acknowledgement by every subscriber, both new and existing, of having received and understood the advisory described in paragraph (D)(1) of this section.

Response: JoiPhone does not permit a subscriber to sign up for Service unless he or she acknowledges and accepts the E911 limitations associated with VoIP service.

- (5) Distribute to its existing subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on or near the equipment used

Ms. Marlene H. Dortch
November 14, 2006
Page 6

in conjunction with the interconnected VoIP service. Each interconnected VoIP provider shall distribute such warning stickers or other appropriate labels to each new subscriber prior to the initiation of that subscriber's service.

Response: All subscribers receive E911 warning labels along with the ATA when they sign up for Service.

III. Compliance with the Public Notice.

The Public Notice sets forth additional information that interconnected VOIP providers must submit with their Compliance Letter. Those requirements, together with JoiPhone's information required thereby are set forth below in the section headed "911 Solution":

- (A) **911 Solution.** This description should include a quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.

Response: As indicated, JoiPhone, pursuant to the Intrado Agreement, relies entirely upon Intrado to deploy E911 capability. Once JoiPhone has transmitted the Registered Location to Intrado, it contractually relies upon Intrado to provide 911 service in compliance with the *VoIP 911 Order*.

Further, the detailed description of the technical solution should include the following components:

- (1) **911 Routing Information/Connectivity to Wireline E911 Network:** A detailed statement as to whether the provider is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."⁶ If the provider is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, this statement should include a detailed explanation why not. In

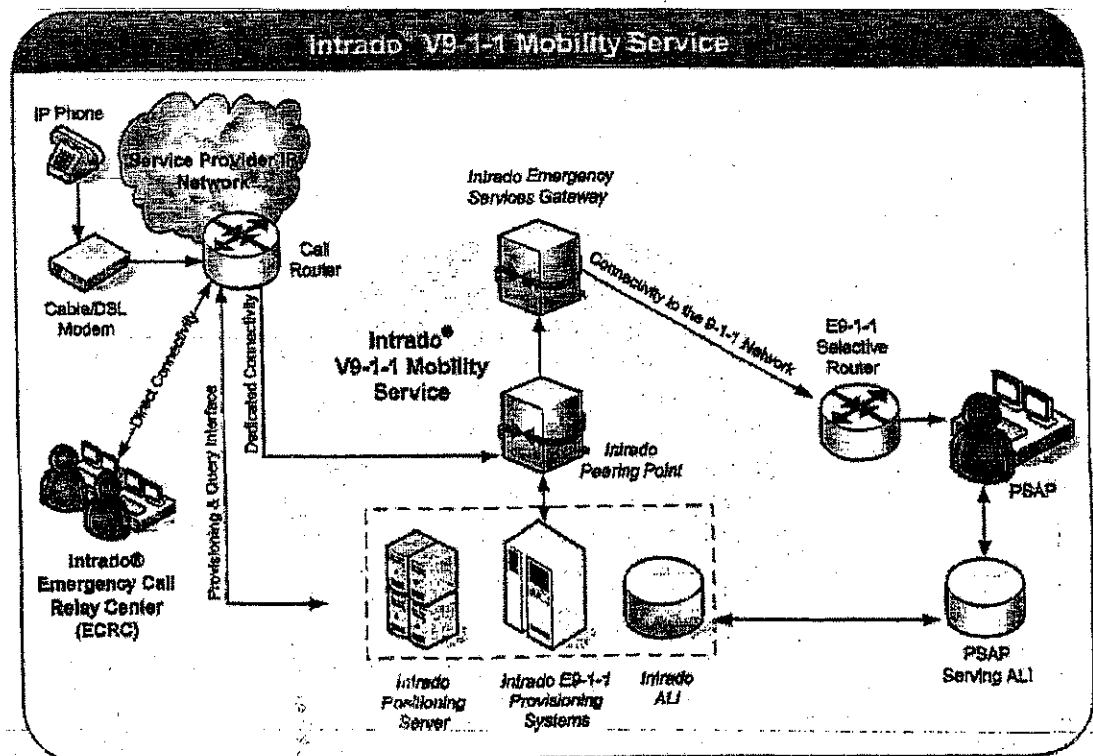
⁶ In re: IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking (WC Docket Nos. 04-36, 05-196) (June 3, 2005) ("*VoIP 911 Order*"), 20 FCC Rcd 10269-70 (2005), ¶ 42 (citations omitted).

Ms. Marlene H. Dortch
November 14, 2006
Page 7

addition, the provider should quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005.

Response: See response to 911 Solution above. Intrado has provided JoiPhone with a rolling forecast regarding its deployment capability.⁷ As of October 10, 2006, Intrado is routing 911 calls to 3,502 PSAPs. An excerpt from the Intrado Agreement depicting the 911 call flow is as follows:

Figure 1 – Intrado Services Overview



⁷ Upon request, Intrado shall make this forecast available to the Commission, subject to confidential treatment available under the Commission's rules.

Ms. Marlene H. Dortch

November 14, 2006

Page 8

Services Solution Delivery

The Services call routing architecture may vary geographically based on: (i) agreements entered into by Intrado with regional local exchange carriers ("LECs"), (ii) deployment of Intrado Emergency Service Gateways, and (iii) agreements with third party CLECs for access into the 9-1-1 network (Selective Router ("SR") access and Automatic Location Identification ("ALI") steering agreements). Figure 1 above provides an overview of the Services architecture, provisioning, and call routing.

JoiPhone submits subscriber data into the Intrado Services systems by means of either a validation and update interface ("VUI"), a real-time XML based transactional interface or a batch file interface (as more specifically described in the Intrado Agreement). The Intrado "geo-coding" process determines latitude and longitude (x, y) coordinates for the subscriber base record. Subscriber base records that are successfully geo-coded are inserted or changed within the subscriber database on Intrado's IntelliVector Position Server to enable appropriate call routing.

A subscriber base record that successfully geo-codes, is matched against the Master Street Address Guide ("MSAG") database for street address validation. A subscriber base record that is successfully validated is inserted or changed within the subscriber database using Intrado's dynamic ALI capabilities to enable a VoIP 9-1-1 caller's address to be delivered to the PSAP.

All subscriber base records in error will be sent to an Intrado data integrity unit analyst for resolution and resubmitted to Intrado's services provisioning systems once error processing is complete. Subscriber base records in error that cannot be resolved in one (1) business day by Intrado will be sent to JoiPhone for resolution.

Intrado has advised JoiPhone that Intrado's service provisioning process supports local number portability ("LNP") allowing the subscriber to submit VoIP Subscriber Records that have been ported from other ILEC(s) or CLEC(s).

When JoiPhone receives a 9-1-1 call, it delivers the ANI to one of the Intrado Peering points with the ANI delivered. Once the ANI is delivered to Intrado, the Intrado IntelliVector Position Server determines available routing instructions for the VoIP subscriber's telephone number ("TN"). If a native 9-1-1 solution is available, the Intrado IntelliVector Position Server returns a ten (10)-digit ESRN and a ten (10) digit ESQK and the Intrado network will complete the 9-1-1 call to the appropriate SR based on location of the caller. The ESRN value returned may or may not be PSTN routable. If native 9-1-1 solution is not available the Intrado IntelliVector Position Server returns a ten (10)-digit PSTN routable PSAP DN of the appropriate PSAP. Intrado's Emergency Service Gateway redirects the call via the PSTN to the PSAP DN

Ms. Marlene H. Dortch

November 14, 2006

Page 9

with the VoIP subscriber's TN as the CPN. In the event of transmission link failures, a non-response from either IntelliVector Position Server, or an error message in the GRIXE query response, Intrado has advised JoiPhone that Intrado will route the call through the PSTN to the Intrado ECRC (available 24 hours a day at all times throughout the year). ECRC personnel will manually query Intrado's systems, followed by use of JoiPhone's systems when available or network operations center ("NOC") personnel when available to deliver the call to the geographically appropriate PSAP.

- (2) **Transmission of ANI and Registered Location Information:** A detailed statement as to whether the provider is transmitting via the Wireline E911 Network, the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. This information should include: (i) a quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits; (ii) a quantification of the number of subscribers, on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information; and (iii) if the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.

Response: This ties into the explanation above describing Intrado's procedures for geo-coding and MSAG address validation; which information is then stored in Intrado's systems. When the 911 call comes into the Intrado Intellivector Positioning server, it will associate the latitude and longitude to the appropriate ESRN and ESQK. The ESRN will route the call to the appropriate SR and ESQK will route the call to the appropriate PSAP. The ESQK will be used to steer ALI information back through to the PSAP for ALI displayed in areas where PSAPs have Dynamic ALI capability.

- (B) **911 Coverage:** To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for

Ms. Marlene H. Dortch

November 14, 2006

Page 10

coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.

Response: See response to **911 Routing Information/Connectivity to Wireline E911 Network** and **911 Solution** above.

- (C) **Obtaining Initial Registered Location Information:** A detailed description of all actions the provider has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location. This information should include, but is not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the provider has obtained the Registered Location.

Response: As indicated, JoiPhone requires subscribers to provide this information at the time they sign up for Service. As JoiPhone is a new entrant, it does not yet have any subscribers. Accordingly, the contact and quantification information is not applicable at this time. JoiPhone shall keep a record, including relevant dates and contact methods, for each subscriber to whom it provides Service in the future, along with each subscriber's acknowledgement as required by the E911 Rules.

- (D) **Obtaining Updated Registered Location Information:** A detailed description of the method(s) the provider has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the provider is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.

Response: As indicated, JoiPhone requires subscribers to update their Registered Location information as a condition of continued 911 Service and permits subscribers to update that information via JoiPhone's Website at <http://www.joiphone.com>.

- (E) **Technical Solution for Nomadic Subscribers:** A detailed description of any technical solutions the provider is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

Response: See the Intrado Compliance Package attached hereto at Exhibit "A".

SAPRONOV & ASSOCIATES, P.C.

ATTORNEYS AT LAW

Ms. Marlene H. Dortch

November 14, 2006

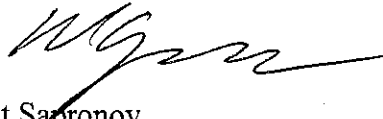
Page 11

JoiPhone shall not accept new subscribers of the Service in any areas where it is not transmitting 911 calls, either itself or via the Intrado Agreement, to the appropriate PSAP in full compliance with the Commission's E911 Rules.

Please do not hesitate to contact us with any questions that you may have.

Very truly yours,

SAPRONOV & ASSOCIATES, P.C.



Walt Sapronov
Attorneys for Hawk Communications, LLC
d/b/a JoiPhone

cc: Ms. Kathy Berthot, Deputy Chief
Spectrum Enforcement Division
Enforcement Bureau
Federal Communications Commission

Ms. Janice Myles
Competition Policy Division
Wireline Competition Bureau
Federal Communications Commission

Dana Shaffer, Esq., Deputy Chief
Public Safety & Homeland Security Bureau
Federal Communications Commission

Best Copy and Printing, Inc.

Hawk Communications, LLC d/b/a JoiPhone

(all via Overnight Mail)